

With over a year and a half under my belt as the General Manager of a Low Power FM station, I have reached several simple realizations.

Firstly, I believe LPFM's (and LPAM's, should they ever come to pass) should be allowed to run limited commercial announcements. In fact, to make things fair, I think all NCE's should be allowed some form of commercial sponsorship.

That said, there should be some major restrictions, which would make these broadcasters different in the eyes of Congress from their commercial brethren. This difference should be sufficient enough to make them exempt from frequency auctions.

The first restriction would be localism. All sponsored announcements would either have to adhere to current Underwriting Standards, or be on behalf of sponsors that are actually located within the station's predicted 40dbu contour. If the message has a call to action, or a comparative statement, then it must be for a local sponsor. This means only local businesses would qualify. As I see it, these businesses are very important parts of your local community. They generally can't afford to advertise on regular commercial stations, but for community stations, they make a perfect match. They need us, and we need them.

The second restriction I'd make is frequency of spots. I'd suggest no more than 5 minutes per hour, and not let that be averaged over a 24 hour day.

If we continue to ignore the small local independent businesses, we are just asking for even more Wal-Marts and McDonalds. One of the goals of LPFM is to help build strong communities, and one of the ways to do that is to help local business. It is a simple way to create localism in radio, where everyone would benefit.

I have also concluded that for most rural LPFM stations, the restriction of 100 watts ERP is not sufficient to do the job. While I don't think many community broadcasters want or need excessive power, most that I'm familiar with have serious problems penetrating buildings that are still well within what most people would consider to be a community.

To make matters worse, for those of us who live in rural areas, our "community" is a bit bigger than it is for city dwellers. For instance, in my area, the local high school is a little over 10 miles away. The nearest hospital is 14.5 miles in the other direction. Most people who live in our community commute to work in towns that are 12-15 miles away. Even most retail centers are a good 10-15 miles from our transmitter, even though is situated dead center in the lake community we serve. A geographical anomaly? Perhaps, but it is reality in East Texas. We need to be receivable at these very important places in our community.

I'd like to propose that the Commission consider raising power levels in rural areas. In my estimation 250 watts, which would give parity with most rural translators, would seem reasonable. I would hope that the same antenna height requirements as those for translators would also apply.

I also believe for these stations to continue to be viable, LPFM needs to be given primary station status. This would be done to prevent them from being displaced by new translator applications, or by full power stations that are attempting to move closer to highly populated areas.

These are simple ideas. I'm afraid it is too late to reverse the tide for full power stations in the battle for localism. The large operating groups are simply doing what the law allows. Congress has made it possible for them to do what they are doing, and that will be almost impossible to change. The only real hope I see for localism is through low power stations. For them to thrive, they need to be given the tools it takes to succeed.

Thank you for your consideration,

Chuck Conrad
General Manager
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